

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,
DEFENDANTS

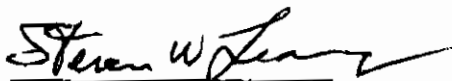
**MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE**

Now comes the Defendant Michael Bergdoll and moves that the conditions of his pre-sentencing release restricting his travel to Commonwealth of Massachusetts and the State of Connecticut be modified.

The Defendant seeks permission to travel to Hampton Beach, New Hampshire with his wife, Judith Bergdoll, and two sons, Michael J. Bergdoll and Joseph Bergdoll. This trip will occur from August 3-4, 2006, and the Defendant and his family will be staying at The Ashworth Hotel, 295 Ocean Boulevard, Hampton Beach, New Hampshire. The telephone number for the hotel is 800-345-6736.

Counsel for the Defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

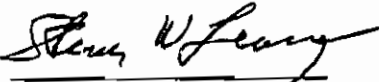
The Defendant
Michael Bergdoll
By his attorney


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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

August 1, 2006


Steven W. Leary